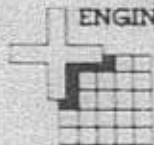


Reference 47



SHINER MOSELEY AND ASSOCIATES, INC.
ENGINEERS • CONSULTANTS

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Tel: (512) 857-2211 Fax: (512) 857-9244

December 28, 1995

VIA FAX
J50156

Mr. Monico Banda
NSR Program (MC-162)
TNRCC Office of Air Quality
P.O. Box 13807
Austin, TX 78711-3807

Dear Mr. Banda:

As I mentioned when we talked by phone on Thursday, December 21, MJP Resources Inc. proposes to modify their operations near Aransas Pass. Supporting documentation for their original plans was sent to you by fax on October 31, 1995. A revised Form PI-7 was then faxed on November 3, 1995. Notice that these facilities were exempt from permitting was received by MJP Resources, Inc. via a November 8, 1995 letter from the TNRCC (Standard Exemption Registration No. 30788).

The proposed revision to the operating plans consists of the addition of two (2) existing 55,000 bbl internal floating roof tanks into the system. These tanks will be utilized when barges with crude oil volumes exceeding that which can be handled by the original two (2) 20,000 bbl tanks. Total throughput in the system will not be increased because of this change.

Attached for your consideration regarding this change are the following items:

- A revised Form PI-7 executed by MJP Resources, Inc.
- A revised Pg. 1 of the "30 TAC CHAPTER 116, SECTION 116.211, PERMIT EXEMPTIONS - APPLICABILITY CHECKLIST" showing the amended calculated VOC emissions.
- Four (4) pages of emission calculations which show the impact of this proposed change to the whole system.
- A completed "TABLE 7 (d) INTERNAL FLOATING ROOF STORAGE TANK SUMMARY" for each of the two (2) existing storage tanks.

Please note that pages which were not affected from the original supporting documentation were not resubmitted. These include the second page to the "APPLICABILITY CHECKLIST", the "Standard Exemption 86 Checklist", and the "Standard Exemption 106 Checklist".

Mr. Monico Banda
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A revised description of the process is as shown below:

Crude oil (South Texas Light) will be transported by barge two to three times per month to an existing barge unloading facility in the Redfish Bay area off the Intracoastal Waterway near Aransas Pass, TX. Barge pumps with an expected maximum rate of 1,500 bbls/hr (1,050 gal/min) will be utilized to transfer the crude oil from the barge unloading facility through an existing piping system to four existing internal floating roof tanks. Two tanks have a capacity of 55,000 bbls (2,310,000 gal) each and two tanks have a capacity of 20,000 bbls (840,000 gal) each. The crude oil will be routed to the appropriate tank or tanks depending upon the size of the barge being unloaded. The crude oil will then be pumped from the storage tanks to transport trucks by means of an existing truck rack. The maximum pump rate at the truck rack is 300 bbls/hr (210 gal/min). The truck rack operations include the use of a vapor recovery system. The facilities involved in this proposed operation have just been refurbished and returned to top working order.

Thank you again for all your help. Once again we appreciate your earliest possible consideration of this matter and look forward to hearing back from you in the near future.

Sincerely,

SHINER, MOSELEY AND ASSOCIATES, INC.

W. A. Hayes

W.A. (Allan) Hayes, P.E.
Project Manager

WAH/as

Attachments

